

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

JOSUE CANCEL  
ZORAIDA FALCON

Chapter 13

Debtor

Bankruptcy No. 17-16026-ELF

**OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTOR(S)**

**AND NOW** comes, WILLIAM C. MILLER, ESQUIRE, chapter 13 standing trustee, to object to confirmation of the chapter 13 plan of debtor(s), because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or debtor(s) has/have failed to provide information, evidence, or corrections to the petition, schedules, statements or other documents filed by debtor(s) to enable the standing trustee to evaluate the Plan for confirmation, as follows:

Debtor(s) has/have failed to provide evidence of insurance coverage on vehicle(s) owned by such debtor(s) as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

The Plan does not provide for the submission of all or such portion of future earnings or other future income of the debtor(s) to the supervision and control of the standing trustee as is necessary to fund the Plan, in violation of 11 U.S.C. Sections 1322 (a)(1).

Debtor(s) has/have failed to provide evidence of insurance coverage on real property owned by such debtor(s) as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

**WHEREFORE**, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ William C. Miller  
William C. Miller, Esquire  
Chapter 13 Standing Trustee